

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

Paul Sellors and Elizabeth Sellors,

Court File No.: 04-CV-02895
(RHK-AJB)

Plaintiffs,

vs.

**PLAINTIFFS'
SUPPLEMENT TO REPLY
MEMORANDUM**

Legionaries of Christ, an organization,
Legion of Christ, Incorporated, a
New York corporation, FAMILIA
USA, Inc., a New York corporation,
FAMILIA, a Minnesota non-profit
Corporation and Anthony Bannon,

Defendants.

The Defendants contend that the copyright license granted to the Sellors in the settlement of this matter does not include the right to publish the works in any language other than English. (See p. 9 of Defendants' Memorandum). Of course, the Defendants do not recognize any such limitation on their right to use the works. There is nothing in the transcript of the proceedings before this Court limiting the Sellors' rights to publications in English.

A copyright registered in the United States is protected in most foreign countries under the series of international treaties. These treaties are described in Nimmer on Copyright, Volume 4, Section 17.04. In other words, it was not necessary for the Sellors to have registered their works in any language other than English. Their United States registrations protected them abroad.

Hence, there is no basis for the Defendants' contention that by implication, the Sellers' rights should be limited to publication in English because their United States copyright registrations were done in English.

KRAUSE & ROLLINS, CHTD.

April 4, 2005.

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